

Plaintiff in Pro Per
Todd Michael Schultz
818 N DOHENY DR. #1108
West Hollywood, CA 90069
310-435-5847
toddschultz86@gmail.com

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

TODD MICHAEL SCHULTZ
Plaintiff,
v.
MICHAEL C. THOMPSON
GREGORY R. HOLMES
YOUTUBE LLC
Defendants

Case No. 2:23-cv-03452-JAK-MRWx

**MEMO TO OPPOSE YOUTUBE LLC'S
OBJECTIONS TO PLAINTIFF TODD
MICHAEL SCHULTZ'S REQUEST FOR
ADMISSION**

1) Plaintiff contends that the “discovery” yielded in an RFA is not
“discovery” in the spirit of the law, which is overseen by a magistrate judge.
This is personal information, inter-party discovery which is encouraged at the
outset.

2) Plaintiff contends that they must answer the questions to Plaintiff, who
may not lodge the answers with the court until proper “discovery” begins under
Honorable Judge Wilner.

1 3) Plaintiff believes this is the case and that YouTube LLC is obstructing
2 any possible way for Plaintiff to understand any of their actions and so their
3 dismissal must be very unlikely and very well founded by legal theory and case
4 law, which it currently is not. (See MEMO TO OPPOSE DISMISSAL BY
5 YOUTUBE by PLAINTIFF).
6

7 4) Thus, YouTube LLC should answer the RFA in full, per State Law.
8 This is not the seeking of “discovery” which is determined by Judge Wilner.
9
10

11 Dated August 14, 2023

Signed By

12
13 Todd Michael Schultz

14 In Pro Per
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

.....

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28